



ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.
COLUMBIA, SOUTH CAROLINA

September 12, 2008

VIA ELECTRONIC FILING

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

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**Re: Time Warner Cable Information Services' Application to Amend its
Certificate of Public Convenience & Necessity to Provide Telephone
Services in the Service Area of PBT Telecom, Inc.
Docket No. 2008-328-C**

Dear Mr. Terreni:

Enclosed for filing please find Time Warner Cable's 1st Set of Interrogatories and 1st Set of Requests for Production to PBT Telecom, Inc. in the above referenced docket. By copy of this letter copies of these documents are being served on the parties of record.

If you have any questions, please have someone on your staff contact me.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

FRE/tch
Enclosures

cc w/enc: M. John Bowen, Jr., Esquire (via email and hand delivery)
Margaret M. Fox, Esquire (via email and hand delivery)
Nanette S. Edwards, Esquire (via email and hand delivery)
Jeffrey M. Nelson, Esquire (via email and hand delivery)

STATE OF SOUTH CAROLINA

**In Re: Application of Time Warner Cable
Information Services (South Carolina) LLC, d/b/a
Time Warner Cable to Amend its Certificate of
Public Convenience and Necessity to Provide
Telephone Services in the Service Area of PBT
Telecom, Inc. and for Alternative Regulation**

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

COVER SHEET

**DOCKET
NUMBER: 2008-328-C**

(Please type or print)

Submitted by: **Frank R. Ellerbe, III**SC Bar Number: **1866**

Address: **Robinson, McFadden & Moore, P.C.
PO Box 944
Columbia, SC 29202**

Telephone: **(803) 779-8900**Fax: **(803) 252-0724**

Other:

Email: **fellerbe@robinsonlaw.com**

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigatio	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket N. 2008-328-C

IN RE:	Application of Time Warner Cable Information)	
	Services (South Carolina), LLC, d/b/a Time)	TIME WARNER CABLE
	Warner Cable to amend its Certificate of Public)	INFORMATION SERVICES
	Convenience and Necessity to Provide)	1ST SET OF
	Telephone Services in the Service Area of PBT)	INTERROGATORIES TO PBT
	Telecom, Inc. and for Alternative Regulation)	TELECOM, INC.
)	

Pursuant to 26 S.C. Regs. 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable ("Time Warner Cable" or "Applicant") requests that PBT Telecom, Inc. ("PBT Telecom" or Company") respond to the following interrogatories within twenty days of service:

INTERROGATORY NO. 1-1

List and identify PBT Telecom's affiliations with any other corporation, subsidiary corporation or companies. For each, provide the following information:

- a. legal name,
- b. date of incorporation or formation,
- c. percentage of ownership by PBT Telecom,
- d. officers and directors,
- e. principal place of business and/or primary address,
- f. type of services provided.

INTERROGATORY NO. 1-2

List all affiliated entities that are authorized to provide competitive local exchange

services in South Carolina. For each entity, list the areas where service is being provided.

INTERROGATORY NO. 1-3

Identify all exhibits, charts, documents or other items which you intend to introduce at the hearing in this matter.

INTERROGATORY NO. 1-4

Do you contend that Time Warner Cable's service would have an adverse impact on the affordability of local telephone service within the service area of PBT Telecom? If so,

- a. state with specificity each fact or reason supporting such contention;
- b. identify all witnesses who will testify about such fact or reason, and
- c. identify all documents concerning or related to such contention.

INTERROGATORY NO. 1-5

Do you contend that PBT Telecom would lose revenue from competition with Time Warner Cable resulting in increases in rates to rural subscribers? If so,

- a. state with specificity each fact or reason supporting such contention;
- b. identify all witnesses who will testify about such fact or reason, and
- c. identify all documents concerning or related to such contention.

INTERROGATORY NO. 1-6

State PBT Telecom's net income for each of the past five years.

INTERROGATORY NO. 1-7

List the areas in which PBT Telecom or an affiliated company provides video and/or cable television services. For each area, list the date PBT Telecom or an affiliated company began providing video and/or cable television services.

INTERROGATORY NO. 1-8

Provide a diagram illustrating PBT Telecom's corporate structure and organization.

INTERROGATORY NO. 1-9

Please describe the VoIP services provided by PBT Telecom or an affiliated entity.

INTERROGATORY NO. 1-10

Please list the total annual amount of funds the Company received from the Federal Universal Service Fund for each year from 2002 through 2007.

INTERROGATORY NO. 1-11

Please list the total annual amount of funds the Company received from the S.C. Universal Service Fund for each year from 2002 through 2007.

INTERROGATORY NO. 1-12

Describe how the Company's operations expenses have varied over the last three fiscal years.

INTERROGATORY NO. 1-13

Describe how the Company's operating revenue has varied over the last three fiscal years.

INTERROGATORY NO. 1-14

Would the availability of more than one telephone service provider in the Company's local service area benefit consumers? If the response above is anything other than an unqualified yes, explain why telephone service competition would not benefit customers.

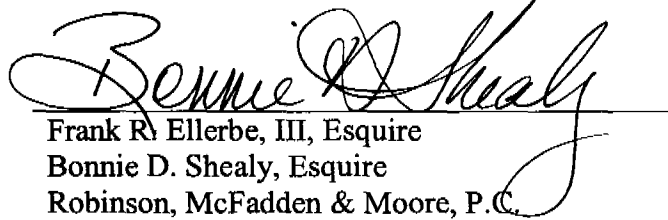
INTERROGATORY NO. 1-15

Do you contend that Time Warner Cable has provided telephone services within the Company's service area without certification from the Commission? If so, provide the basis for your contention.

Dated this 12th day of September, 2008.

Respectfully submitted,

ROBINSON, MCFADDEN & MOORE, P.C.



Frank R. Ellerbe, III, Esquire

Bonnie D. Shealy, Esquire

Robinson, McFadden & Moore, P.C.

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and

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Attorneys for Time Warner Cable Information
Services, (South Carolina), LLC

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket No. 2008-328-C

IN RE:	Application of Time Warner Cable Information)	
	Services (South Carolina), LLC, d/b/a Time)	TIME WARNER CABLE
	Warner Cable to amend its Certificate of Public)	INFORMATION SERVICES
	Convenience and Necessity to Provide)	1ST REQUEST FOR
	Telephone Services in the Service Area of PBT)	PRODUCTION TO
	Telecom, Inc. and for Alternative Regulation)	PBT TELECOM, INC.
)	

Pursuant to 26 S.C. Regs. 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable ("Time Warner Cable" or "Applicant") requests that PBT Telecom, Inc. ("PBT Telecom") produce the following documents and/or things within twenty days of service:

REQUEST NO. 1-1.

All documents, writing, exhibits listed in or used in the preparation of PBT Telecom Answers to Time Warner Cable's First Set of Interrogatories.

REQUEST NO. 1-2

Copies of PBT Telecom's and PBT Communications, Inc.'s financial statements for the last five years.

REQUEST NO. 1-3

Copies of PBT Telecom's and PBT Communications, Inc.'s Annual Reports filed with the Public Service Commission or Office of Regulatory Staff for the last five years.

REQUEST NO. 1-4

Copies of tariff pages for PBT Telecom and PBT Communications related to the provision of VoIP services.

REQUEST NO. 1-5

Provide a copy of your annual reports filed with the FCC and/or the United States Department of Agriculture — Rural Utilities Service for each of the last three years.

REQUEST NO. 1-6

Provide a copy of all reports filed with the USAC and NECA for the last three years.

REQUEST NO. 1-7

Provide a copy of all 10-Q reports filed by your company and/or its affiliates with the Securities and Exchange Commission (SEC) for the years 2006, 2007 and 2008.

REQUEST NO. 1-8

Provide a copy of all 10-K reports filed by your company and/or its affiliates with the Securities and Exchange Commission (SEC) for the years 2006, 2007 and 2008.

REQUEST NO. 1-9

Provide copies of any financial projections prepared by or for you in the last three years including associated detail and data.

REQUEST NO. 1-10

Provide a copy of your FCC Form 499-A (Telecommunications Reporting Worksheet) for the last three years.

REQUEST NO. 1-11

Produce a copy of all disclosures your company has made to investors, stockholders or board members regarding the potential impact of competition.

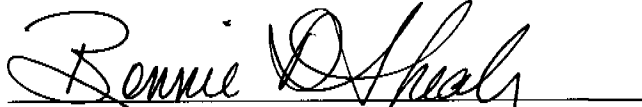
REQUEST NO. 1-12

Produce all documents filed at either the South Carolina Public Service Commission or the FCC explaining your views of the onset of competition in rural areas of South Carolina.

Dated this 12th day of September, 2008.

Respectfully submitted,

ROBINSON, MCFADDEN & MOORE, P.C.



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Attorneys for Time Warner Cable Information
Services, (South Carolina), LLC

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2008-328-C**

In Re:

**Application of Time Warner Cable Information
Services (South Carolina) LLC, d/b/a Time
Warner Cable to Amend its Certificate of
Public Convenience and Necessity to Provide
Telephone Services in the Service Area of PBT
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CERTIFICATE OF SERVICE

This is to certify that I, Leslie Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Time Warner Cable Information Services' 1st Set of Interrogatories and 1st Request for Production to PBT Telecom, Inc.** in the foregoing matter by causing a copy of same to be hand delivered, in an envelope addressed as follows:

Nanette S. Edwards, Esquire
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

M. John Bowen, Jr. Esquire
Margaret M. Fox, Esquire
McNair Law Firm, PA
1301 Gervais Street
Columbia, South Carolina 29201

Dated at Columbia, South Carolina this 12th day of September, 2008.



Leslie Allen